SDMS US EPA REGION V -1

SOME IMAGES WITHIN THIS DOCUMENT MAY BE ILLEGIBLE DUE TO BAD SOURCE DOCUMENTS.

Exhibit 3.4

Information Requests No. 29-32

CONFIDENTIAL BUSINESS <u>INFORMATION</u>

Pursuant to 40 CFR Part 2, Subpart B, Monsanto Company hereby asserts a business confidentiality claim covering this Exhibit and all documents attached thereto.

TIM Altorney Work Product

EXHIBIT 3.4:MONSANTO INFO REQEST RESPONSE

RESPONSIVE TO INFO REQUESTS 29-32: WASTEWATER DISCHAREGES AND DISCHARGES TO DEAD CREEK

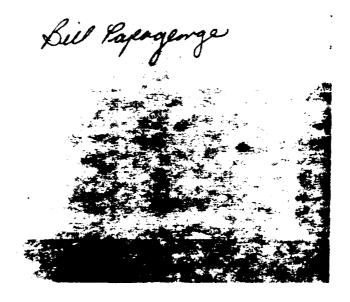
FROM THE DEST OF EARL BRASFIELD: "BILL PAPAGEORGE" FOLLOWED BY HANDWRITTEN NOTES: 1920'S LIQUID WASTE FLOWED INTOI DEAD CREEK; '35 DEAD CREEK DREDGED TO FLOW NORHT FROM QUEENY AVE.; '38 ALOCROR PRODUCTION STARTED; 38-51 LANDFILLING PRIMARILY DONE IN WORK SITE PROPER, INCLUDING CURRENT EDWIN COOPER SITE AND LOT FWEST OF HYWAY 3. 4?-51 DC DREDGED AGAIN TO STOP ALL FLOW IN SOUTHERLY DIRECTION; 51-78: LANDFILL AT RIVER USED FOR TOXIC MATERIALS FROM WGK JFQ AND GEN'L OFFICES. 60-72 WAGGONNER MAJOR TRUCKER FOR WGK PRODUCTS, INCLUDING PCBS.

HISTORY FO KRUMMRICH BY JOHN SPANO: SAFE TO ASSUME THAT DIRECT DISCHHARGES OCCURRED INTO DC UNTIL 1933, WHEN THE SEWERE SYSTERM WAS CONSTRUCTED; AFTER WHICH DISCHARGES ONNLY OCCURRED DURING HIGH RAIN EVENTS. MENTIONS 1935 DREGING AND FILLING OF PART OF RIVER. QUEENY AVE CULVERT FILLED IN IN 1968, STOPPING ALL DISCHARGES OF SURFACE WATER (RUNOFF FLOW). "IT IS KNOWN THAT DURING 1917 TO 1930S THE PLANT DISPOSED OF ITS WASTES IN A COMMERCIAL LANDFILL OWNED BY LEO SAUGET IN THHE AREA AROUND THE SAUGET VILLAGE HALL NEAR QUEENY AND NICKEL AVENUES. FROM 1938-51 WASTES DISPOSED PRIMARILY ON PLANT OWNED PROPERTY, EITHER AT THE SITE OF THE PRESESENT COOPER PLANT OR A LANDFILL WEST OF HYWAY 3. FROM 1951-1978 OPERATED OWN LANDFILL ON A 20 ACRE COMPANY OWNED TRACT EAST OF OUR EXISRTING RIVER TERMINAL SITE COVERED IN 1979.

SEE MCO0009506-7 FOR ABOVE ADMISSIONS.

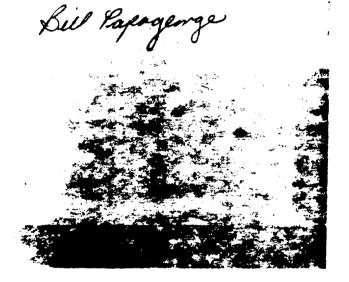
MAJOR SEWER REPAIR WORK 1987
MAP SHOWING LOCATION OF REPAIRS
DOCS INDICATE THAT DC WAS BEING USED AS ARETENTION BASIN FOR WASTES DURING STORMS EVENTS.

From the dust of EARL N. BRASFIELD



MCO 6323702

From the destroi EARL N. BRASFIELD



MCO 6323702

- 1920'S LIQUID WASKE FLEWED TO DEAD CHICK.
 - SOLID WILLIAM FILLPIANT IN BREA E. OF SEUTIN OF PLANT IN BREA E. OF CERRO & WEAR VILLAGE HIZL.
- 31-33- VILLAGÉ SÉLUER SYSTEM CONSTRUCTED
 by WPA.

 OVER FLOW FREM LUGK WENT TO

 DEND CRILL FER EXCESSIVE RAIN

 F FLOOD WATTER.
 - '35 DEAD CREEK DREDGED TO FLOW NORTH
 - 35 FILLED IN SAUGET VILLAGE HALL HALL DENT

38 - ARECLOR PRODUCION STARTED

38-51- LANDFILL PRIMINEILY DENE IN LOCK SITE PREPIER INCLUDING CURRENT EDWIN COLPER SITE AND LOT F WIST OF HOLY 3. ALL FLOW TO-BLIX JN STATES

DIRECTION.

51-78 - LANDFILL AT RIVER LISED FOR TORE MAT'L FROM WGK, SFB, & Gen. OFFICES RES.

ALSO NITTED, PORT PLOSTICS, & JULEPA.

- CONCRETE PLUG PEURES IN QUIENY
AVE. CULYERT TO FRANKINGY
SEAL HOLE. NO MOSOR FLOWMADE CHANGE TO STOP THEN RAIN
WATTER.

78 - WGK LANDFILL CLOSED -& COVER COMPLETED IN 1950.

MCU 0323704

CO-72 - WHECONER TRUCKS MAJOR MAJOR TRUCKER FIRM MORE BLANT BRIDGETS,

W. G. KRUMMRICH WASTE DISPOSAL (with map)

HISTORY OF PLANT

Monsanto Company purchased the original site of the W. G.

Krummrich Plant in Sauget, Ill., in 1917. It is named in honor of
a former plant manager. Fewer than 100 employees worked at the 30-acre
plant site when it was acquired from the Commercial Acid company. Today
the plant stretches over 328 acres, employing more than 1,400 persons
with an annual payroll of \$32 million. Of the total employees, 75
percent live in Illinois. The plant manufactures a variety of intermediate chemicals which are important to many industries.

BACKGROUND ON WATER RUNOFF

Back in the early 1900s, Dead Creek started somewhere north, flowed through the industrialized Granite City district, and emptied into the Mississippi River, about five miles south of the area now called Sauget. Dead Creek carried rain water runoff from north of East St. Louis along with domestic and industrial waste water. When Monsanto bought the chemical acid plant in 1917, the creek entered the property on the north side and flowed southward through the plant site. We believe it is safe to assume that industrial waste entered the creek bed throughout its length in those early times.

MCO 0009505

FINAL DRAFT
John J. Spano
Oct. 20, 1980
Page 2

The village of Sauget was incorporated in 1926. In 1933, the Sauget village sewer system was completed. After 1933, all effluent from the plant flowed into the village sewer system. However, during infrequent floods and unusually heavy rainfall, the storm water runoff washed throughout the area, and could have flowed toward the creek.

In 1935, the creek was dredged between Monsanto's plant and Queeny Avenue, and sometime later the portion in the plant was filled in. This occurred shortly after Queeny Avenue was relocated two blocks southward to its present site. A culvert running under Queeny Avenue to the creek was blocked by the Village of Sauget, stopping the runoff flow southward. In 1968, a concrete plug was poured in the culvert to permanently seal the outlet, stopping any runoff flow completely to the south.

PLANT WASTE DISPOSAL

Currently and in recent years, industrial wastes from the Krummrich plant are either handled by contract landfill or contract incineration, or in-plant incineration. Solid non-liquid wastes are sent to an Illinois EPA-approved landfill. Concentrated liquid wastes are shipped to incinerator sites operated by Rollins Environmental Services.

Although no records exist, it is known that in the early times (1917 to the 1930s), the plant disposed of its wastes in a commercial land-fill operated by Leo Sauget in the area around the Sauget Village Hall near Queeny and Nickel Avenues. This landfill was filled and covered by the operator.

MC0 0009506

From 1938-1951, wastes were disposed of primarily on plant-owned property, either at the site of the present Cooper plant or a landfill west of Highway 3.

From 1951-1978, we operated our own landfill on a 20-acre company-owned tract east of our existing river terminal. This site was covered and clay-capped in 1979.

SAMPLING PROGRAM

Monsanto, as a responsible industrial citizen of the community, is concerned about Dead Creek. We offered to cooperate with the Illinois EPA and share samples to help develop facts concerning safety of the area. We are hopeful that our assistance will help resolve the situation.

MCD 0009507

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COMPANY CONFIDENTIAL

FROM (HAME-LOCATION-PHONE)	Steven D. Smith (2542)) W.G.K. Plant	Den	Gul "
Octobe	r 21. 1981	S.C.	P. E. Heisler	

TO

. Jack W. Molloy Warren L. Smull CONFIDENTIAL 92-CY-204-WUS

I strongely feel that we should recommend to the Village of Sauget Officers that they do not use "Dead Creek" for storm water storage for the following environmental reasons:

1. The recent "Superfund" legislation defines an "Owner and Operator" as "Persons who presently...operate facilities at which hazardous wastes...have been treated, stored, or disposed..." By the Village using the ditch for a storm water lagoon, they would essentially take over as operators of a hazardous waste disposal site, which is unapproved and has been alleged to be a health hazard by one or more individuals.

Once the Village was designated as the operator of the site, they may very well inherit the responsibility and cost of cleaning up the "toxic pollutants", which were dumped there in the past by other unknown individuals. I would guess this cost at \$2 to \$5 million dollars.

- 2. Hy understanding of the proposed Williage project is that the rain water would be drained back from Dead Creek to the Village sewers. The Association has gone on record with the EPA stating that we have no "point sources" of PCB's within our sewer system. Since the Creek has already been analyzed to contain high concentrations of PCB's, this Creek would become a "point source" of PCB's to the Village. This would not be acceptable to the EPA permit writers for the Treatment Plant's NPDES permit. They would undoubtedly require the Village (or Association) to "pretreat" this source. I assume they would consider some type of carbon absorption as required.
- The Village could become a Respondent to law suits under the Illinois Nuisance law. Certainly, by storing their storm water in the ditch, a good argument could be made that they are increasing the groundwater pollution in the area, by supplying an additional hydraulic gradient over the contaminated dirt; therefore, increasing the groundwater contamination problem.

For these reasons and others, I feel we should try to convince the Village to use a different alternative in solving their storm water problem.

SDS/jc

CER 008094

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